

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster**

This document relates to:

*The County of Cuyahoga v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P. et al.*,
Case No. 18-OP-45090

**DECLARATION OF DONNA M. WELCH IN SUPPORT OF DEFENDANTS'
MEMORANDUM IN OPPOSITION TO TRACK ONE PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY ADJUDICATION OF THEIR EQUITABLE CLAIMS FOR
ABATEMENT OF AN ABSOLUTE PUBLIC NUISANCE**

I, Donna M. Welch, declare as follows:

1. I am an attorney at Kirkland & Ellis LLP, counsel for Defendants Allergan plc f/k/a Actavis plc (specially appearing), Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc., Allergan Sales, LLC, and Allergan USA, Inc. in the above captioned case.
2. I submit this declaration in support of the Defendants' Memorandum In Opposition To Track One Plaintiffs' Motion For Partial Summary Adjudication Of Their Equitable Claims For Abatement Of An Absolute Public Nuisance.
3. Attached as Exhibit 1 is a true and correct copy of the January 14, 2019 30(b)(6) Deposition Transcript of Thomas Gilson.

Respectfully submitted,

Dated: July 31, 2019

/s/ Donna M. Welch
Donna M. Welch, P.C.
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Attorney for Defendants Allergan plc (specially appearing), Allergan Finance, LLC (f/k/a/ Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.), Allergan Sales, LLC, and Allergan USA, Inc.

CERTIFICATE OF SERVICE

I, Donna M. Welch, hereby certify that the foregoing document was served via the electronic mail to all parties.

/s/ Donna M. Welch
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